

Desk Statement
Sunflower Power Holcomb Plant
Prevention of Significant Deterioration (PSD) Construction Permit

EPA Regional Administrator Karl Brooks sent a letter to Robert Moser, Secretary of the Kansas Department of Health and Environment on February 3, 2011 asking that the Kansas Department of Health Environment (KDHE) address EPA concerns regarding the Sunflower Power Holcomb Plant PSD Construction Permit.

Background:

- On December 16, 2010, KDHE issued a final Prevention of Significant Deterioration (PSD) permit to Sunflower Electric Cooperative authorizing the construction of a new 895 MW coal-fired steam generating unit.
- EPA provided comprehensive comments on August 12, 2010, and October 22, 2010, as part of the public comment period.

EPA believes it is important that all Clean Air Act requirements are addressed in the Sunflower permit. Therefore, it is important that KDHE adequately address EPA's comment that the permit needs to ensure that the National Ambient Air Quality Standards (NAAQS) are protected. This includes protection of the new nitrogen dioxide (NO₂) and sulfur dioxide (SO₂) NAAQS by establishing enforceable short-term limits for emissions of those pollutants.

The new NO₂ and SO₂ NAAQS were put in place to protect public health. In setting these new NAAQS, EPA determined that short-term exposure to SO₂ and NO₂ can result in adverse health impacts, including difficulty breathing and increased asthma symptoms. This pollution can also result in increased hospital admissions and emergency room visits relating to respiratory illnesses, particularly in sensitive populations like older adults, children and asthmatics.

Brooks' letter asks KDHE to begin a constructive dialogue about how to resolve EPA's concerns regarding the implementation of the new NO₂ and SO₂ NAAQS in the Sunflower permit and future permit actions.